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John Matze*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JOHN MATZE, an individual,

Plaintiff,

v.

PARLER LLC; NDMASCENDANT, LLC;
JEFFREY WERNICK; MARK MECKLER;
DAN BONGINO; REBEKAH MERCER;
DOES I-X, and ROE
CORPORATIONS XI-XX,

Defendants.

CASE NO.: 2:24-cv-00826-ART-NJK

**STIPULATION AND ORDER TO EXTEND
DISCOVERY DEADLINES**

(SECOND REQUEST)

AND ALL RELATED CLAIMS

The Parties, by and through their respective undersigned counsel, hereby submit this second stipulation to extend discovery deadlines.

I. DISCOVERY COMPLETED TO DATE

Plaintiff/Counterdefendant John Matze ("Matze") has served his initial disclosures and supplemental disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1), including Matze's Ninth Supplemental Disclosure on December 18, 2024. Matze has served written discovery on Defendants Dan Bongino ("Bongino"), Rebekah Mercer ("Mercer"), Jeffrey Wernick

1 ("Wernick"), and Mark Meckler ("Meckler") and Defendants/Counterdefendants Parler LLC
2 ("Parler") and NDMAscendant, LLC ("NDMA") (collectively "Defendants"). All Defendants
3 have served responses to Matze's discovery requests. Similarly, all Defendants have served their
4 respective initial disclosures, with supplements as needed pursuant to Federal Rule of Civil
5 Procedure 26(a)(1). Bongino, Mercer, and Meckler have served written discovery on Matze, to
6 which Matze has responded. In addition, the parties have sought discovery from non-parties and
7 are in the process of receiving and reviewing those responses.

8 **II. DISCOVERY REMAINING TO BE COMPLETED**

9 The Parties need to continue to exchange written discovery, and address outstanding
10 issues regarding the Parties productions and discovery responses. The Parties also need to
11 complete the depositions of those individuals identified in their respective disclosures. In
12 addition, the parties also need to conduct expert discovery.

13 **III. REASONS WHY REMAINING DISCOVERY CANNOT BE COMPLETED**

14 The parties respectfully request to extend the remaining discovery deadlines by sixty (60)
15 days to accommodate continued document production efforts and time to resolve pending
16 disputes, including those which may impact expert disclosures. Furthermore, this Court is set to
17 hear Parler's Motion to Change Venue (ECF No. 11) and Matze's Countermotion to Remand
18 (ECF No. 20) on January 16, 2025. Additionally, a stay is currently in place as to Parler because
19 of its bankruptcy, resulting in delays in discovery. There is a pending litigation in the United
20 States District Court Southern District of Florida¹ of related to Matze's FRCP 30(b)(6) subpoena
21 to the Rebekah A. Mercer 2020 Irrevocable Trust, seeking information necessary to expert
22 discovery.

23 **IV. PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY**

24 The proposed discovery schedule set forth below extends the remaining discovery
25 deadlines by sixty (60) days:
26
27

28 ¹ Case No. 9:24-mc-81254-RLR

Description	Current Deadline	Proposed Deadline
Close of Discovery	03/17/2025	05/16/2025
Reports from Retained Experts	01/13/2025	03/17/2025
Rebuttal Experts	02/14/2025	04/16/2025
Dispositive Motions	04/14/2025	06/16/2025
Joint Pretrial Order	05/14/2025, or 30 days after resolution of dispositive motions	07/16/2025, or 30 days after resolution of dispositive motions

DATED this 23rd day of December, 2024

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DATED this 23rd day of December, 2024

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*Attorneys for Defendants,
 NDMAscendant, LLC and Rebekah Mercer*

DATED this 23rd day of December, 2024

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DATED this 23rd day of December, 2024


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Attorneys for Defendant, Jeffrey Wernick

IT IS SO ORDERED.

Dated: December 24, 2024


 United States Magistrate Judge

1 DATED this 23rd day of December, 2024

2 **LAW OFFICES OF ROBERT P.**
3 **SPRETNAK**

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